

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

JASON DOVE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:16-cv-413-JTM-SLC
)	
DEKALB COUNTY SHERIFF)	
DONALD LAUER, QUALITY)	
CORRECTIONAL CARE, LLC,)	
and NURSE BLAIR,)	
)	
Defendants.)	

PLAINTIFF'S MOTION TO AMEND COMPLAINT

COMES NOW Plaintiff, by counsel, pursuant to Rule 15(a) of the federal rules of civil procedure, hereby amends his Complaint. The purpose of filing the amended complaint is to set forth clearly the existence of a claim under 42 U.S.C. § 1983, indicate that the DeKalb County Sheriff has a non-delegable duty to provide adequate medical care to inmates/suspects housed in his jail, and provide the full name of Defendant Blair Lipsey. Plaintiff requests that the amended complaint relate back to the time of the filing of the initial complaint, on November 4, 2016. Plaintiff's first amended complaint is attached hereto, made a part hereof, and incorporated herein.

WHEREFORE, Plaintiff request that the Court allow Plaintiff to amend his complaint, and that the Court order that the amended complaint is deemed retroactive back to the date of the filing of the initial complaint, November 4, 2016, and for all other just and proper relief in the premises.

Respectfully Submitted,

Christopher C. Myers & Associates

/s/ David W. Frank

David W. Frank, #31615-02

Christopher C. Myers, #10043-02

809 South Calhoun Street, Suite 400

Fort Wayne, IN 46802

Telephone: (260) 424-0600

Facsimile: (260) 424-0712

CERTIFICATE OF SERVICE

The undersigned hereby swears that a true and correct copy of the foregoing document was sent, via United States Mail, postage prepaid, or by some other means acceptable to this Court, on this 18th day of January, 2017, to the following:

Shane C. Mulholland
Burt, Blee, Dixon, Sutton & Bloom, LLP
200 East Main Street, Suite 100
Fort Wayne, IN 46802

Janet A. McSharar
Drewry Simmons Vornehm LLP
Carmel City Center
736 Hanover Place, Suite 200
Carmel, IN 46032

/s/ David W. Frank